

Robert A. Gutkin, Esq. (Pro hac vice)
Blair M. Jacobs, Esq. (Pro hac vice)
Christina A. Ondrick (Pro hac vice)
SUTHERLAND ASBILL & BRENNAN LLP
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004-2415
Tel: 202-383-0100
Fax: 202-637-3593

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<hr/>)	
LEIGHTON TECHNOLOGIES LLC,)	
)	
Plaintiff,)	Case No. 04-cv-02496 (CM)(LMS)
)	
v.)	
)	PLAINTIFF AND COUNTERCLAIM
)	DEFENDANT LEIGHTON
OBERTHUR CARD SYSTEMS, S.A.,)	TECHNOLOGIES LLC'S MOTION
OBERTHUR CARD SYSTEMS,)	TO FILE DOCUMENTS UNDER SEAL
OF AMERICA CORPORATION)	
)	
Defendants.)	
<hr/>)	
OBERTHUR CARD SYSTEMS, S.A.,)	
OBERTHUR CARD SYSTEMS)	
OF AMERICA CORPORATION)	
)	
Counterclaim Plaintiffs,)	
)	
v.)	
)	
LEIGHTON TECHNOLOGIES LLC,)	
GENERAL PATENT CORPORATION)	
INTERNATIONAL,)	
GENERAL PATENT CORPORATION,)	
AND IP HOLDINGS LLC,)	
)	
Counterclaim Defendants.)	
<hr/>)	

Pursuant to paragraph 14 of the Protective Order entered in this case on August 20, 2004, Leighton Technologies (“Leighton”) respectfully requests that the Court permit Exhibits A, D, E, F, G & H to the Declaration of Robert A. Gutkin (“Gutkin Declaration”) In Support Of Leighton’s Motion for Leave to File an Amended Answer to Counterclaims, Affirmative Defenses (“Motion for Leave to Amend”). In support of this motion, Leighton states as follows:

1. On August 20, 2004 a Protective Order was entered in this case. A copy of the Protective Order is attached to this Motion as Ex. A.
2. The Protective Order provides in Paragraph 14, in part, that information designated “Confidential” and/or “Trial Counsel’s Eyes Only” “shall NOT be filed with the Clerk of Court,” but shall be submitted “to chambers in camera in a sealed envelope....”
3. Exhibits A, D, E, F, G & H of the Gutkin Declaration contain material that has been designated “CONFIDENTIAL – ATTORNEY’S EYES ONLY” pursuant to the August 20, 2004 Protective Order.
4. In order to maintain Leighton’s obligations under the Protective Order, it is necessary for Leighton to file Exhibits A, D, E, F, G & H of the Gutkin Declaration under seal.
5. Pursuant to the Protective Order, Leighton will file with the Clerk of the Court unredacted copies of Leighton’s Motion for Leave to Amend, including Exhibits A, D, E, F, G & H of the Gutkin Declaration, in an envelope marked “SEALED AND IMPOUNDED RECORD” in the event that the instant motion is granted by the Court.

For the reasons stated above, Leighton respectfully requests that the Court permit Exhibits A, D, E, F, G & H of the Gutkin Declaration to be filed under seal.

Dated: March 27, 2008

SUTHERLAND ASBILL & BRENNAN LLP

/s/ Robert A. Gutkin

By: Robert A. Gutkin, Esq. (Pro hac vice)

Blair M. Jacobs, Esq. (Pro hac vice)

Christina A. Ondrick, Esq. (Pro hac vice)

1275 Pennsylvania Avenue, N.W.

Washington, D.C. 20004-2415

Tel: 202-383-0100

Fax: 202-637-3593

Attorneys for Plaintiff

LEIGHTON TECHNOLOGIES LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LEIGHTON TECHNOLOGIES LLC,

Plaintiff,

V.

OBERTHUR CARD SYSTEMS, S.A.,

Defendant.

Case No. 04-cv-02496

(CM)(LMS)

[PROPOSED] ORDER

Upon consideration of Plaintiff and Counterclaim Defendant Leighton Technologies LLC's Motion to File Documents Under Seal and papers filed in support thereof, and good cause being shown, IT IS HEREBY ORDERED THAT:

Plaintiff's Motion for Leave to File Documents Under Seal is GRANTED;

Southern District of New York

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of March, 2008, the foregoing **PLAINTIFF**
LEIGHTON TECHNOLOGIES, LLC'S MOTION TO FILE DOCUMENTS UNDER
SEAL was served on all parties via e-mail and overnight mail:

By: /s/ Robert A. Gutkin _____
Attorney for Plaintiff